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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

Sondra Williamson,

Plaintiff,

vs.

Aetna Life Insurance Company, as Claims
Administrator for the Bank of America
Long-Term Disability Plan; Does I
through V; Roe Corporations I through V,
inclusive,

Defendants.

No. 2:17-CV-02653-RFB-CWH

**STIPULATION AND ORDER TO
EXTEND DEADLINES**

(THIRD REQUEST)

Defendant Aetna Life Insurance Company and Plaintiff Sondra Williamson hereby jointly stipulate and move for an order amending the Court's Scheduling Order (ECF 8) pursuant to LR 26-4. This request is made in the interest of justice, in order to correct an error made by the defendant's counsel in production of the ERISA Administrative Record before the briefing commences.

I. Discovery Completed/Remaining

This Court entered its Scheduling Order on December 21, 2017. (ECF 8). In accordance with the schedule, Aetna's counsel produced a copy of the ERISA Administrative Record to Williamson's counsel on January 15, 2018. Also in accordance with the schedule, Aetna filed a copy of the Administrative Record with the Court on April 4, 2018. (ECF 12). The original briefing schedule was adjusted slightly. (ECF 10, 14).

II. Reason for Request for Extension

Aetna's counsel has recently become aware that, due to a mistake by counsel, the ERISA Administrative Record produced to Williamson's counsel was substantially incomplete. The same incomplete record was filed with the Court. Aetna's counsel notified Williamson's counsel of the error.

III. Proposed Discovery Schedule

The parties now request that in order to ensure that Williamson's counsel and the Court have access to the complete Administrative Record, the Scheduling Order be amended as follows:

- Aetna will produce the complete Administrative Record to Williamson's counsel by Friday, June 8, 2018 (original deadline: January 15, 2018).
- Aetna will file the complete Administrative Record with the Court by Friday, June 22, 2018 (original deadline: April 4, 2018).
- Williamson's opening brief on the merits of the ERISA claim will be due on Friday, July 6, 2018 (currently due June 1, 2018).
- Aetna's opposition brief on the merits of the ERISA claim will be due on Friday, August 24, 2018 (currently due July 2, 2018).
- Williamson's reply brief on the merits of the ERISA claim will be due on Friday, September 21, 2018 (currently due July 16, 2018).

The undersigned represent to the Court that this request for extension is made in good faith and not for purposes of delay.

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1 Accordingly, the parties jointly request the Court to adopt the proposed
2 scheduling deadlines as indicated above.

3 DATED this 30th day of May 2018.

4 OGLETREE, DEAKINS, NASH, SMOAK &
5 STEWART, P.C.

6
7 By: /s/ Ann-Martha Andrews
8 Ann-Martha Andrews
9 2415 East Camelback Road, Suite 800
10 Phoenix, Arizona 85016
11 *Attorneys for Defendant Aetna Life*
12 *Insurance Company*

13 DATED this 30th day of May 2018.

14 LAW OFFICE OF JULIE A. MERSCH

15 By: /s/ Julie A. Mersch
16 Julie A. Mersch
17 701 S. 7th Street
18 Las Vegas, Nevada 89101
19 *Attorneys for Plaintiff Sondra Williamson*

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21 IT IS SO ORDERED.

22 DATED: June 21, 2018

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25 C.W. HOFFMAN, JR.
26 UNITED STATES MAGISTRATE JUDGE
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CERTIFICATE OF SERVICE

I hereby certify that on the 30th day of May 2018, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing was sent to the following CM/ECF registrant:

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/s/ Diane M. Kelly
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